

November 3, 2017

*VIA ELECTRONIC FILING*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Re: SES Americom, Inc. and O3b Limited, Notice of *Ex Parte* Presentation  
Use of Spectrum Bands Above 24 GHz For Mobile Radio Services, et al.,  
GN Docket No. 14-177, IB Docket Nos. 15-256 & 97-95; RM-11664; WT  
Docket No. 10-112**

Dear Ms. Dortch:

On November 1 and 2, 2017 Suzanne Malloy, Philippe Secher and Will Lewis met with met separately with Kevin Holmes of Commissioner Carr's office and Umair Javed of Commissioner Rosenworcel's office.

The meetings focused on the draft Second Report and Order, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, and Memorandum Opinion and Order ("Order") in the above-captioned proceeding. SES and O3b addressed issues of importance to both geostationary orbit and non-geostationary Fixed Satellite Service ("FSS") operators. The discussion centered on the issues involving the following bands: the 24.25-24.45 and 24.75-25.25 GHz (the "24 GHz band"); 27.5-28.35 GHz (the "28 GHz band"); 37-38.6 GHz (the "37 GHz band"), 38.6-40 GHz (the "39 GHz band"); and the 47.2-50.2 GHz band (the "47 GHz band").

SES discussed the Commission's proposals for these bands in its draft order, including rules addressing co-location of earth stations. SES asked that the Commission consider adjustments to the numerical limit imposed on earth stations per county or PEA. SES also urged the Commission to not to include grandfathered earth stations in the population limits created by the Order.

SES also highlighted the role that current and next generation geostationary ("GSO") and non-geostationary ("NGSO") satellite systems will play in facilitating the deployment of mobile services in the U.S. The ability of these systems to meet the throughput demands of U.S. customers and end users in these underserved regions will depend on reliable access to spectrum in the bands discussed above. SES noted that O3b's NGSO system enables current

generation mobile services and applications and is supporting the provision of mobile connectivity in Puerto Rico while local terrestrial networks are being rebuilt.<sup>1</sup>

Please contact me if you have questions about this submission.

Respectfully submitted,

**SES Networks**

/s/ Will Lewis

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cc: Kevin Holmes  
Umair Javed

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<sup>1</sup> See O3b Limited, File No. SES-STA-20171011-01135 (granted Oct. 13, 2017); O3b Limited, File No. SES-STA-20171011-01141 (filed Oct. 17, 2017); SES Americom, Inc., File No. SES-STA-20171020-01188 (granted Oct. 24, 2017; SES Americom, Inc., File No. SES-STA-20171025-01206 (granted Oct. 27, 2017).